# UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Nicola Jane Clancy

Debtor 1

Chapter 13

Case No. 1:16-BK-03239-HWV

Matter: Motion for Termination of Wage Attachment

Order

#### MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Nicola Jane Clancy, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about August 6, 2016.
- 2) Debtor 1 receives regular income from employment with United States Postal Service (USPS) which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
  - 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: September 15, 2021

/s/ Nicola Jane Clancy

Debtor 1

### **DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire PA ID No. 201207 2132 Market Street Camp Hill, PA 17011 (717) 975-9446 pmurphy@dplglaw.com Attorney for Debtor(s)

Desc

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### **ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should immediately cease the wage attachment in the amount of \$117.69 from eachbi-weekly paycheck.

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#### CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, September 15, 2021, I served a true and correct copy of the Debtor(s)' Motion for

Termination of Wage Attachment Order and proposed Order in this proceeding upon the following:

Via USPS First Class Mail
United States Postal Service (USPS)
Attn: Payroll Administrator
St. Louis General Law Service Center
1720 Market Street, Room 4200
Saint Louis, MO 63155

<u>Via Electronic Means</u>
Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee Ronald Reagan Federal Building 228 Walnut Street, Suite 1190 Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P. Paralegal for Paul D. Murphy-Ahles, Esquire